

EXHIBIT A

TO *GRAZIOSO* PLAINTIFFS' PROPOSED CLERK'S CERTIFICATE OF DEFAULT

PLAINTIFFS' APPLICATION FOR CERTIFICATE OF DEFAULT

PURSUANT TO LOCAL CIVIL RULE 55.1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001 :
: :
: APPLICATION FOR
: CERTIFICATE OF
: DEFAULT PURSUANT TO
: LOCAL CIVIL RULE 55.1
: :
: 1:03 MDL 1570 (GBD)(SN)
: :
-----X

This Document Relates to
Grazioso, et al. v. The Taliban, et al.
1:22-cv-01188 (GBD)(SN)

TO THE CLERK OF COURT:

NOW COME the *Grazioso* Plaintiffs, through counsel, and respectfully submit this Application for Certificate of Default Pursuant to Local Civil Rule 55.1. Plaintiffs rely on the Affidavit of Dennis G. Pantazis, Esquire, and exhibits thereto, filed contemporaneously herewith, in making this Application.

The *Grazioso* Plaintiffs seek a Certificate of Default against Defendant the Taliban.

Defendant the Taliban has failed to enter an appearance in this Court and has not filed any responsive pleading to the *Grazioso* Plaintiffs' Second Amended Complaint, or any other pleading filed by the *Grazioso* Plaintiffs.

Grazioso Defendant the Taliban has been afforded more than sixty (60) days to file responses, yet has not appeared in that time.

Pursuant to the Court's April 21, 2021 Order, service of the *Grazioso* pleadings and related materials on *Grazioso* Defendant the Taliban is now complete.

Respectfully submitted,

Date: November 8, 2023

/s/

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